

MD Recycling Ltd Ltd.

Environmental Management Manual

DRAFT

No	SECTION	Page
1	Scope	3
2	EMS Documentation Control	4
3	Environmental Policy	6
4	Environmental Aspects/impacts	7
5	Environmental Legal requirements	9
6	Objectives and Targets	10
7	Structure, Responsibility and Resources	11
8	Training, Awareness and Competence	12
9	Communication	13
10	Environmental Control	14
11	Problem Identification and Correction	15
12	Environmental Records	16

1. SCOPE OF EMM

This Environmental Management manual describes the Environmental Management System at the MD Recycling Ltd's recycling site in Penparc. It encompasses the management of all environmental aspects which arise as a result of the recycling of waste on the in-vessel composting and aggregate recycling site. **There are 2 copies of this manual located in the following places:**

Copy No. 1 is held in the MD Recycling Ltd office, Penparc

Copy No. 2 is held on computer in MD Recycling Ltd office, Penparc.

2. ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) DOCUMENTATION

A document control system is used to ensure all controlled documents in circulation are using the current information and that a log of all past alterations is kept to create a history for reference.

Responsibility

It is the responsibility of Marc Davies and Stephanie Davies to manage the document control system; including updating/amending/approval of all system documentation.

The documentation system relevant to the Environment Management System is based upon :-

1. Environmental Management Manual
2. Environmental Procedures distributed on the site

These are supported, as appropriate, by:

- Legislative documentation
- Registers and records
- The Environmental Management Manual
- Environmental Procedures

All controlled documents should have a version number and date.

The Environmental Management Manuals are issued in controlled version only.

Uncontrolled copies will be issued internally and externally denoting that it is an uncontrolled copy.

Amendments procedure and record

Every page of a controlled document should be authorised, dated and carry a version number e.g. 1.0. Every amendment made to a particular procedure will be implemented through issue of a revised page (s) which will similarly be authorised and dated and carry a revised version number e.g. 1.1.

All amendments to the Environmental Management Manual/procedures will be authorised and issued by Authorised document controller.

Old copies of the page(s) before amendment will be kept for a period of at least two years.

All documents within the Environmental Management system are subject to periodic review within the audit programme, this is carried out at least annually.

Reference

Redundant documents shall be kept as hard copies in MD Recycling Ltd's offices.

Procedures are established to ensure documents are controlled, available and up to date. Responsibilities relating to co-ordinating the associated activities are identified within the specific procedures.

3.ENVIRONMENTAL POLICY

The Site's Environmental Policy relates to the requirements of Green Dragon Environmental Management System. It is a statement of the company's commitment to the protection of the environment and continual improvement of the site's environmental performance.

The Site environmental policy is aimed at addressing the principle objectives and activities of MD Recycling Ltd, Penparc, which have the greatest impacts on the environment. Procedures and registers are in place, which identify the specific aspects and related improvement programmes.

The Directors of the company are ultimately responsible for ensuring that the Environmental Policy is communicated, implemented and maintained at all levels of the company, and is available to the public upon request.

Responsibility

It is the responsibility of the company Directors to agree and sign the Environmental Policy to demonstrate senior management commitment.

It is then Marc Davies responsibility to ensure that the policy is communicated to all levels within the unit and ensure it is readily available to the general public upon request.

Marc Davies is also responsible for ensuring that the policy is reviewed at least once per annum at the Environmental management review meeting.

It is the responsibility of all Site employees to comply with the policy and minimise the Site impact on the environment.

Site Policy Availability

The Site Policy is widely available to the public, it can be found in:

- Site office
- The environmental policy is displayed and discussed at internal awareness training sessions.
- MD Recycling Ltd policy will also be made available for publication on the Green Dragon web page

The policy will be made available upon request to the public.

4.ENVIRONMENTAL ASPECTS

The Site's Environmental Aspects Register aims to determine those aspects of its activities, which could have a significant impact on the environment. These include consideration of emissions to air, releases to water, contamination of land, waste management, land and local issues, and the use of raw materials and natural resources. This includes normal and abnormal conditions. Aspects are evaluated for significance using a process of risk assessment.

Initially the aspects were identified by a series of site walkovers, tours and from the initial environmental review.

When the aspects are been given some order of significance by the risk assessment process the results are considered when setting environmental objectives and targets to allow the company to manage reduction of environmental impact.

Responsibilities

Marc Davies is responsible for assessing the significance of the environmental aspects.

Marc Davies is responsible for the maintenance of the environmental aspects register.

A review of the environmental aspects register should take place annually (or more frequently if a major change occurs) by Marc Davies and discussed by senior management at management review meetings.

The purpose of this procedure is to outline how the environmental aspects of the Site's activities are evaluated.

An environmental aspects register has been compiled to identify the significance of aspects in order to control the impact of the business on the Environment through the continual improvement process.

Evaluation of environmental aspects takes place by Marc Davies and Stephanie Davies on an annual basis (or more frequently if a major change occurs) as part of the Environmental Management System review.

Marc Davies collates information on environmental effects within the Site, both direct and indirect, and updates the aspects register accordingly.

Evaluating the significance of Aspects

It is Marc Davies's responsibility to assess the significance of the identified aspects. The aspects register is then discussed at the Environmental management meeting on an annual basis (or if a major change occurs).

A scoring system has been used to highlight the significance of each environmental aspect, this is an important process as the aspects analysis is objective and identifies the areas of the Site that need to be manage.

Environmental objectives and targets have been set to reflect the significant aspects identified in order to achieve the required environmental performance improvement.

When all the environmental aspects for the Site have gone through the significance test a final figure is obtained by adding the scores together. These are then shown in a table format on the significant aspects register.

Once the analysis is complete for each aspect, to highlight the areas, which need most attention, a list is prioritised with the highest score topping the list. This aids the setting of objectives and targets.

A manageable number of aspects, which can be improved within the planned time frame e.g. 6 improvements projects may be manageable in one year depending on the resources available.

If there is any change to legislation, Marc Davies or Stephanie Davies will ensure that relevant considerations are made with regards to the environmental aspects register.

Note: Environmental aspects register is stored in the site office.

5. ENVIRONMENTAL LEGISLATION

Procedures are maintained that identify the mechanisms to ensure that relevant legislation is known, documented, monitored and kept up to date.

Scope

The Penparc Site aims to maintain a register of environmental legislation that is relevant to its activities.

Responsibilities

Stephanie Davies is responsible for the maintenance of the Environmental Legislation Register. The maintenance includes updating the register when amendments are made to existing legislation, or new legislation is put in place that could have an impact on site operations. Copies of relevant consents are kept in the site office.

Procedure

All activities for which the Site has direct responsibility should be included as well as those that would indirectly have a significant impact on the factories processes and products.

The Environmental Legislation Register will be updated as and when necessary and will include the consideration of:

- New environmental legislation affecting the Site's activities
- Amendments to existing relevant legislation
- Modifications or new processes occur that have any relevant applicable legislation

New legislation

The Site is kept up to date with new legislation primarily by updates on a regular basis by subscribing as a member to the CIWM, and by the use of the EA website, and close communication with the relevant departments (i.e the Environment Agency and DEFRA).

Records

Copies of relevant consents – held in office

Environmental legislation register - held in office

6. SITE ENVIRONMENTAL OBJECTIVES AND TARGETS

Scope

Site environmental objectives and targets are identified and documented. These are consistent with the Site

Environmental Policy and where practical, shall quantify the commitment to continual improvement in environmental performance over defined time scales.

Responsibility

It is the responsibility of MD Recycling Ltd directors to set the Site's Environmental Objectives and Targets and ensure that they are communicated at all levels within the Site.

It is the responsibility of all Site employees to work towards the Site objectives and targets, in order to successfully achieve them.

It is also Marc Davies to review the objectives and targets on an annual basis.

The Site will set itself Environmental Objectives and Targets consistent with its Environmental Policy in order to prevent pollution and bring about a continual improvement in its environmental performance. Objectives will take into account legal and other requirements, significant environmental aspects, technological options, financial, operational and business requirements. These will be discussed periodically at management review meetings.

Records

- Environmental Objectives and Targets. – held in office

7. STRUCTURE AND RESPONSIBILITY

The site directors are ultimately responsible for providing the resources necessary to comply with the requirements of the EMS.

The authority and responsibilities of environmental management are defined within procedures, and include ensuring that the system is implemented and maintained. However, Marc Davies and Stephanie Davies are ultimately responsible for all aspects of the Environmental Management of the Penparc site.

8. TRAINING, AWARENESS AND COMPETENCE

Scope

It is the Site's objective to ensure that all personnel whose activities and job responsibilities relate to functions affecting significant environmental aspects, possess the appropriate experience or are suitably trained to perform their job satisfactorily.

Responsibility

It is the responsibility of Stephanie Davies to outline any Site environmental training requirements.

It is the responsibility of Stephanie Davies to ensure that all employees receive relevant Environmental Training.

It is the responsibility of Stephanie Davies to identify specific Environmental Training skills and needs for all Employees, and to incorporate these into the Penparc Site Environmental Skills Matrix database. This database will be kept up to date and an appropriate training programme developed, managed and maintained.

It is the responsibility of Stephanie Davies to keep all employee training records up to date with regards to Environmental Training.

All personnel at every level shall receive Environmental Training with regard to the importance of conforming to the Site Environmental Policy. Status on Employee Policy Training will be recorded. Also to understand how their role impinges on the Environment and key matters on Environmental protection.

Specific Skills

Training will be given wherever specific skill requirements are identified, such as internal auditor. Training needs are identified by Stephanie Davies by assessing whether an individual's job warrants specific training taking into account any affect on significant environmental impacts. Training will be planned accordingly and highlighted on MD Recycling Ltd's Training Matrix

Other Environmental Training

Other training requirements may become apparent as a result of audits, or change in roles or operations. In the event of this, training will be given to enhance knowledge to expected standards.

Training records

Records of all who have attended training sessions will be held as hard copies in the Penparcoffice.

Procedures are established and maintained which identify responsibilities and the methods used to ensure that personnel at all levels are aware of the importance of compliance with the environmental policy and procedures, and the environmental issues relating to the activities of the Site.

Systems are maintained (i.e. training matrix) to ensure that training needs are identified and appropriate records are kept of training and awareness programmes carried out. These training activities include making personnel aware of the environmental impacts of their work, the benefits of improved performance, and the possible consequences of deviance from the environmental site policy and procedures.

9. COMMUNICATION

Scope

The Site maintains a communication system for receiving, documenting and responding to communications from interested parties with reference to anything concerning the site's environmental impact or Environmental Management System.

Responsibility

It is the responsibility of Marc Davies to respond to environmental enquiries from the public, such as complaints, incidents or enquiries. It is also the responsibility of Marc Davies to deal with regulatory bodies such as the Environmental Agency, DEFRA and the Local Authority.

A comprehensive record of all calls and complaints received are held on site.

Communication is key to the Site to ensure everyone is fully up to date with environmental issues, and progress against site objectives and targets. Methods of achieving this are specified in the EMM under the relevant section.

10. EMERGENCY CONTROL

Methods are established and maintained to monitor and measure on a regular basis, the key characteristics of the Site's operations and activities that can have a significant impact on the environment.

This document has been implemented to preserve life, minimise damage to the site and the environment in the event of a major emergency or disaster on Site.

Potential emergency situations are identified through the aspects evaluation procedure, which is carried out at least once per annum; and if necessary a procedure will be considered for inclusion in the system.

The two major emergency situations arising from the operations of MD Recycling Ltd (according to the evaluations of aspects) are Fire and Flood .

An emergency spill procedure no; 011 exists to instruct employees how to deal with an oil spill.

An emergency fire procedure no. Fire can be found on the Site Notice Board.

EMERGENCY NUMBERS:

Contact	Telephone
Environment Agency	
Ambulance	
DEFRA	
Welsh water	
Police	
Marc Davies	
Stephanie Davies	
MD Recycling Ltd office	

11. PROBLEM IDENTIFICATION AND CORRECTIVE ACTION

In the event that activities are not complying with the EMS, actions are taken to identify the root cause and implement corrective action.

Responsibilities are defined within the documented procedures, which identify the authority of personnel to initiate investigations into the cause of non-compliance, and implement the associated corrective action.

Corrective actions are established and monitored for their effectiveness.

- The site is walked every day to ensure no non compliances occur. Strict adherence to Environmental permit, Environment Agency requirements and DEFRA Regulations must be observed at all times.
- Weekly monitoring records are kept to ensure key aspects are controlled, copies of which can be found on site.
- Frequent spot checks are undertaken by the Environment Agency to ensure problem identification.
- Stephanie Davies will address any problems identified by customers.
- All Directors are responsible for dealing with Regulatory Authorities.
- Any necessary corrective actions identified by any interested party will be discussed by Marc Davies and Stephanie Davies and appropriate necessary actions will be taken.

Problems will be identified through regular checks and when internal auditing commences.

12. ENVIRONMENTAL RECORDS

Records relating to environmental performance, verification and training which help demonstrate compliance with the EMS are stored.

Procedures identify the specific records stored and their retention period and location.

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|-----------------------------------|---------------------|
| • Training records | Penparc office |
| • Waste transfer notes | Penparc Site Office |
| • Environmental Permit | Penparc offices |
| • Employers Liability Certificate | Penparc offices |
| • Waste Carriers Licence | Penparc offices |
| • Procedures | Penparc offices |
| • Team Briefing Records | Penparc Site Office |
| • Tonnage Received Information | Penparc offices |
| • Obsolete Documentation | Penparc offices |
| • Green Dragon Documentation | Penparc offices |
| • Health and Safety Documentation | Penparc offices |
| • Service Schedules | Penparcsite office |